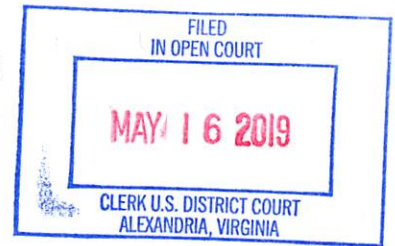


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MICHAEL BUTLER,

Defendant.

)
) Case No. 1:19-CR- 164

)
) Count 1: 18 U.S.C. § 2252(a)(2) & (b)(1)
) Receipt of Child Pornography

)
) Count 2: 18 U.S.C. § 2252(a)(4)(B) & (b)(2)
) Possession of Child Pornography

)
) Forfeiture Notice: 18 U.S.C. § 2253(a)
)

INDICTMENT

May 2019 Term – at Alexandria, Virginia

COUNT ONE

(Receipt of Child Pornography)

THE GRAND JURY CHARGES THAT:

In or about March 2015, in Sterling, Virginia, within the Eastern District of Virginia, the defendant, MICHAEL BUTLER, knowingly received and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, to wit: digital visual depictions of minors engaged in sexually explicit conduct that the defendant received and attempted to receive via a peer-to-peer network using a Toshiba Satellite laptop with a 750GB hard drive.

(In violation of Title 18, United States Code, Section 2252(a)(2) & (b)(1).)

COUNT TWO
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

Between at least in or about February 2015 and in or about July 2015, in Sterling, Virginia, within the Eastern District of Virginia, the defendant, MICHAEL BUTLER, knowingly possessed and attempted to possess at least one matter containing one or more visual depictions that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which visual depictions were produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: digital visual depictions of minors engaged in sexually explicit conduct, distinct from those referred to in Count One, stored on a Toshiba Satellite laptop with a 750GB hard drive.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B) & (b)(2).)

FORFEITURE NOTICE

Under Federal Rule of Criminal Procedure 32.2(a), the defendant, MICHAEL BUTLER, is hereby notified that, if convicted of committing the offenses alleged in the Indictment, he shall forfeit to the United States under 18 U.S.C. § 2253: any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or promote the commission of such offense or property traceable to such property. This property includes, but is not limited to:

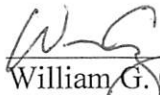
1. A Toshiba Satellite C75DB7100 laptop (S/N: ZE029171U) containing a 750GB Toshiba hard drive (S/N: 9422T1CZT).

A TRUE BILL
Pursuant to the E-Government Act,,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



William G. Clayman
Special Assistant United States Attorney (LT)
Carina A. Cuellar
Assistant United States Attorney